

ORIGINAL



EX PARTE OR LATE FILED

December 18, 2002

RECEIVED

DEC 18 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554

Re: Section 68.4(a) of the Commission's Rules Governing Hearing Aid  
Compatibility Telephone WT Docket No. 01-309 Ex Parte

Dear Ms. Dortch:

This is to inform you that on December 17, 2002 representatives of Siemens ICM, Siemens Corporation and Cingular Wireless met with Tom Sugrue, Chief of the Wireless Telecommunications Bureau, Jim Schlichting, Deputy-Chief and other members of this Bureau (see list attached), in order to address issues related to the above referenced proceeding. The attached document was used for discussion purposes.

Please associate this notification and accompanying material with the referenced docket proceeding. The representatives for Siemens were Ross Vincenti, Mark Esherick and Steve Rerger (outside consultant). The representatives for Cingular Wireless were Susan Palmer, and Ben Almond.

If there are any questions concerning this matter, please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads 'Ben G. Almond'.

Ben G. Almond  
Vice President, Federal Regulatory Affairs

Attachments

Cc: Toni Sugrue  
Jim Schlichting  
Joel Taubenblatt  
Mindy Littell  
Joseph Levin  
Patrick Forster

No. of Copies rec'd  
LHM/ARCOE

A handwritten number '071' in black ink, written over a horizontal line.

December 18, 2002

WT Docket No. 01-309 Ex Parte, December 17, 2002

List of attendees – Wireless Telecommunications Bureau

Tom Sugrue  
Jim Schlighing  
Joel Taubenblatt  
Mindy Littell  
Joseph Levin  
Patrick Forsrer

# Siemens/Cingular: A Productive Collaboration

## Why Are We Working Together?

- Our goal is to improve HAC, and access in general.
- We consider this to be a smart business decision.
- We want to accelerate the adoption of the most-beneficial technologies.
- We want to improve communication of known solutions to end-users.

## How Are We Working Together?

- Cingular is working with its major handset vendors to address HAC.
- Siemens has a unit that manufactures mobile phones, and another that manufactures hearing aids.
- Siemens is testing hearing aids and mobile phones together to explore the interaction between RF emission levels and RF immunity. **Siemens is in a unique position to conduct unbiased testing of the interaction of RF emission levels and immunity.**
- Cingular and Siemens *are working together to conduct* field trials and communicate more effectively with consumers.

# There Is No Silver Bullet

... cingular

... mobile



Increased  
Hearing Aid  
Volume

TTY Devices

T-Coil Coupling

RF-Immune Hearing Aids

Special Accessories

- There is a wide variety of hearing loss severity; therefore a range of solutions should be used to improve mobile phone usability.
- The market is providing an increasing number of hearing aids with good immunity to RF from mobile phones. Major improvements since the 1990s.
- Consumers will benefit significantly if these improvements are quantified and then clearly communicated – they will be able to make educated selections of mobile phones, hearing aids, and special accessories.

## We Have Concrete Next Steps Planned

- Siemens is conducting laboratory testing of its hearing aids and its mobile phones to study interference levels during use.

*Targeted completion during early Q1 2003.*

- We expect positive results, and will conduct field testing with reputable organizations service people with hearing loss, such as Gallaudet University and Self-Help for Hard of Hearing People.

*Targeted completion during mid Q2 2003.*

- With continued guidance from hearing loss experts, we will increase communication bandwidth through our sales forces and through mass-market information channels. This will support efforts by Cingular and other carriers to provide enhanced product selection materials.

*Targeted implementation during 2<sup>nd</sup> half 2003.*

# Issues With Mobile Phones and T-Coils

## ***Usability Issues***

- Between 70% and 80% of hearing aids do not have T-Coils.
- Many people who do have T-Coils report that they do not use the T-Coil

## ***Technical Issues***

- T-Coil couplings cannot be RF-immunized and are not secure. ***If the ability to provide inductive coupling is built into handsets, the privacy and security of digital wireless communications will be compromised.***

## ***Regulatory Issues***

- FCC Part 68 HAC rules do not deal with interference or signal quality.
- FCC Part 68 HAC rules were designed for “wired” phones. As a result, a mobile phone could be technically compliant but still unusable.

## ***Recommendation***

- Siemens believes that a T-Coil requirement for mobile phones will cause the industry to incur significant cost while providing little or no material benefit to consumer.

# Summary Recommendations for FCC

- Maintain HAC Act exemption, and remind carriers/manufacturers of their responsibility to address HAC under Section 255.
- Enhance charter and role of standards bodies that have proven success working jointly with the FCC and the FDA in determining technical requirements.
- Create an independent steering committee, ***composed of representatives of the FCC, FDA, manufacturers of handsets and hearing aid and representatives of the hard of hearing community***, to report on current state of mobile phone and hearing aid usability as well as make recommendations to achieve policy objectives.
- Consider a further notice seeking comments on how best to educate consumers regarding product selection.
- Revise Part 24.232 to allow exploration of directional antennas.
- Encourage industry participants to conduct testing similar to that undertaken by Siemens.

**RECOMMENDATION DETAIL**  
SUPPORTING WT DOCKET NO. 01-309 *EXPARTE*

- Maintain HAC Act Exemption, and remind carriers of their responsibility to address HAC under Section 255.
  - ⇒ Removing the exemption detracts from the testing and analysis required to quantify existing levels compatibility among mobile phones, hearing aids, and accessories.
- Enhance charter and role of standards bodies that have proven success working jointly with the FCC and the FDA in determining technical requirements.
  - ⇒ A number of mobile phone and hearing aid manufacturers have used similar forums to address HAC.
  - ⇒ Support of both the FCC and FDA is of critical importance.
- Create an independent steering committee to report on the current state of mobile phone and hearing aid usability.
  - ⇒ Should recommend policy for improving access as needed.
  - ⇒ Should provide information on best practices implemented by participants in either the mobile phone or hearing aids industries.
  - ⇒ Should make recommendations and assist industry participants in developing and addressing effective information to support HAC product selection.
  - ⇒ Should work with consumer organizations and hearing health professionals to develop recommendations for outreach efforts with the hard of hearing community.
- Consider a further notice seeking comments on how to best:
  - ⇒ Educate consumers regarding product selection.
  - ⇒ Account for the barriers (competitive, legal, etc.) that presently constrain companies from performing compatibility testing.
  - ⇒ Identify and implement best practices in improving usability of digital wireless technologies.
- Revise FCC Part 24.232 to permit further exploration of directional antennas.
- Encourage industry participants to conduct mobile phone/hearing aid interference testing similar to that undertaken by Siemens.